

II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: Broad River Correctional Institution
- B. What are the issues that you are attempting to litigate in the above-captioned case? Denial of outdoor exercise
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
- When May 20, 2019 Grievance Number (if available) BRCL - 0447-19
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☒ No ☐
- E. When was the final agency/departmental/institutional answer or determination received by you? 6-19-19
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☐ No ☐
- G. If your answer is YES:
1. What steps did you take? _____
 2. What was the result? _____

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

- A. Name of Plaintiff: Aryee Henderson Inmate No.: 237887
- Address: Broad River C.I. / WA-#242 4460 Broad River Rd, Columbia, S.C. 29210

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: Michal Stephan Position: Warden
- Place of Employment: Broad River Correctional Institution

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Mr. Lashawn Peeples - Associate Warden - Broad River Correctional Institution

Mr. Washington - Associate Warden - Broad River Correctional Institution

Mr. James Parrish - Major - Broad River Correctional Institution

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

Denial of Outdoor Exercise - I am a mentally ill prisoner currently confined at the Broad River Correctional Institution (Broad River C.I.) serving a 25 year sentence for Voluntary Manslaughter. On 4-15-18, at approx. 7:35 p.m., a statewide lockdown for SCDC prisons was issued because of a riot incident at Lee Correctional Institution (Lee C.I.). The riot transpired on the West Yard. I was assigned and living on the East Yard. I was not involved or participant in the riot, nor did I do anything to cause SCDC prisons to go on statewide lockdown. On 4-25-18, I was transferred to Allendale C.I. lock-up. On 5-2-18, I was transferred from Allendale C.I. lock-up to Leiber C.I. On 5-14-18, I was transferred from Leiber C.I. to Broad River C.I. and placed in the Wateree Unit. From 5-14-18 to present date, I have not received any outdoor exercise. To further substantiate this allegation, I have not had any outdoor exercise since 4-15-18. Moreover, Broad River C.I. staff and administrative officials refuse to allow me to work or receive a job, participate or attend any mental health classes, vocational programs, religious services or any other rehabilitative programs or services. During the first week of June 2018, Broad River C.I. C/O's and staff members came to the Wateree Unit and packed-up numerous inmates to be transferred to Mississippi and other outer state prison facilities. In August 2018, statewide lockdown was lifted for the general population, however, Warden Stephon ordered the Wateree Unit to be sanctioned and subjected to statewide 24/7 lockdown status. While subjected to 24/7 lockdown status in the Wateree Unit, there has been no outside air circulating within this unit, no direct sunlight shining in the cell because the windows are painted over with gray paint, and there's a large metal plate bolted over the window to keep you from

IV. STATEMENT OF CLAIM - continued.

seeing the outside world. Upon information and belief - the Warden has designated and stigmatized the Wateree Unit as the most worst and dangerous inmates in the state of South Carolina, with severe limited movement, such as: showers, court appearances, and occasional doctor visits. No inmate is allowed to have a job in this unit. On 5-20-19, I filed an Emergency Grievance pursuant to SCDC Policy GA-01.12(14.1) because these cruel and unusual living conditions are causing me severe health problems, such as: acute chest pains, high-blood pressure, bed sores, headaches, depression and mental anguish. See Exhibit A (Step 1 Grievance). My medical records is evidence to prove same. Please review my medical records for corroboration. The Grievance Coordinator denied my grievance without investigating the complaints alleged within it on 6-12-19. I received a copy of this grievance through the mail on 6-19-19.

V. RELIEF

State briefly and exactly what you want the court to do for you.

Plaintiff be moved to Moultrie (Medical) Unit.

Plaintiff be given a job that receives 2 for 1 earned work credits (EWC)

Grant Plaintiff compensatory damages in the amount of \$50,000
against each defendant jointly and severally.

Grant Plaintiff punitive damages in the amount of \$450,000
against each defendant jointly and severally.

Plaintiff also seek a jury trial on all issues triable by jury.

Plaintiff also seek recovery of his cost in this suit, and

Any additional relief this Court deems just, proper, and equitable

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24th day of June, 20 19.



Signature of Plaintiff